Commonwealth of Kentucky
Natural Resources and Environmental Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382

AIR QUALITY PERMIT

Permittee Name:	Publishers Printing Company
Mailing Address:	13487 South Preston Highway Lebanon Junction, Kentucky 40150
Source Name:	Publishers Printing Company
Mailing Address:	13487 South Preston Highway Lebanon Junction, Kentucky 40150
Source Location:	13487 South PrestonHighway, Lebanon Junction, Kentucky
Permit Type:	Federally-Enforceable
Review Type:	Title V/Synthetic Minor
Permit Number:	V-99-033
Log Number:	F440
Application Complete Date:	February 20, 1998
KYEIS ID #:	104-0440-0032
AFS Plant ID #:	21-029-00032
SIC Code:	2721
Region:	North Central
County:	Bullitt
Issuance Date:	
Expiration Date:	

John E. Hornback, Director
Division for Air Quality

TABLE OF CONTENTS

SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application which was determined to be complete on February 20, 1998, the Kentucky Division for Air Quality hereby authorizes the construction and operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first having submitted a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in the Regulation 401 KAR 50:035, Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

01 (01) Heidelberg 5 Unit Web Offset Heatset Lithographic Printing Press 402 with a 3.056 MMBTU/hr natural gas fired dryer controlled by a TEC, HXC-II-3000 - 1.3 MMBTU/hr natural gas fired catalytic oxidizer with propane as backup - removal efficiency - 90%
Maximum continuous rating*:* Ink - 50 lbs/hr
Fountain solution - 1.3 lbs/hr
Blanket wash - 0.350 gal/hr
Construction commenced*:* April 1991

02(02) Hantscho 8 Unit Web Offset Heatset Lithographic Printing Press 401 with a 4.76 MMBTU/hr natural gas fired dryer controlled by a MMT condenser/filter sytem model saver 8000 - removal efficiency - 72%
Maximum continuous rating: Ink - 50 lbs/hr
Fountain solution - 1.3 lbs/hr
Blanket wash - 0.563 gal/hr
Construction commenced: April 1991

(02) Hantscho 5 Unit Web Offset Heatset Lithographic Printing Press 404 with a 4.0 MMBTU/hr natural gas fired dryer controlled by a MMT condenser/filter system model saver 8000 - removal efficiency - 72%
Maximum continuous rating: Ink - 50 lbs/hr
Fountain solution - 1.3 lbs/hr
Blanket wash - 0.350 gal/hr
Construction commenced: April 1991

(02) Hantscho 6 Unit Web Offset Heatset Lithographic Printing Press 406 with a 4.0 MMBTU/hr natural gas fired dryer controlled by a MMT condenser/filter system model saver 8000 - removal efficiency - 72%
Maximum continuous rating: Ink - 60 lbs/hr
Fountain solution - 1.3 lbs/hr
Blanket wash - 0.350 gal/hr
Construction commenced: Fall 1993

03(03) Hantscho Mark IV 4 Unit Web Offset Heatset Lithographic Printing Press 405 with a 4.0 MMBTU/hr natural gas fired dryer controlled by a Printkleen condenser/filter system Model 802 - removal efficiency - 72%
Maximum continuous rating: Ink - 60 lbs/hr
Fountain solution - 0.7 lb/hr
Blanket wash - 0.425 gal/hr
Construction commenced: February 1994

04(04) Hantscho Mark VII 8 Unit Web Offset Heatset Lithographic Printing Press 407 with a 6.4 MMBTU/hr natural gas fired dryer controlled by a Printkleen condenser/filter system Model 802 - removal efficiency - 72%
Maximum continuous rating: Ink - 60 lbs/hr

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Fountain solution - 1.3 lbs/hr
Blanket wash - 0.625 gal/hr
Construction commenced: February 1994

05(05) Harris M-80 5 Unit Web Offset Heatset Lithographic Printing Press 408 with a 1.5 MMBTU/hr natural gas fired dryer controlled by a MMT condenser/filter system Model SCF5-4500 - removal efficiency - 72%
Maximum continuous rating: Ink - 60 lbs/hr
Fountain solution - 1.3 lbs/hr
Blanket wash - 0.350 gal/hr
Construction commenced: October 1994

APPLICABLE REGULATIONS: None

1. **Operating Limitations:** None

2. **Emission Limitations:** None

3. **Testing Requirements:**
Yearly testing of the catalytic element shall be done by a qualified testing lab.

4. **Specific Monitoring Requirements:**
A. Catalytic oxidizer control:
A monitoring device for the continuous measurement of the gas stream temperature immediately before and after the catalyst bed in the catalytic oxidizer shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications. The monitoring devices shall be certified by the manufacturer to be accurate to +/- 1 percent of the temperature being monitored. The monitoring device shall be connected to a device(s) that records the temperature via a strip chart, electronic media, or other means. Any required recording system shall be installed and operational no later than 180 days from the date of issuance of this permit.
B. Condenser/filter control system:
    1. A monitoring device for the continuous measurement of the inlet and outlet temperature of the condenser/filter control system shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications. The monitoring device shall be certified by the manufacturer to be accurate to +/- 1 percent of the temperature being monitored. The monitoring device shall be connected to a device(s) that records the temperature via a strip chart, electronic media, or other means. Any required recording system shall be installed and operational no later than 180 days from the date of issuance of this permit. 2. Monitoring devices for the continuous measurement of pressure drops across the condenser/filter control system shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications. The monitoring devices shall be certified by the manufacturer to be accurate to +/- 1 percent of the pressure drop being monitored.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

5. Specific Recordkeeping Requirements:

1. Catalytic oxidizer control:

The permittee shall maintain records of the following information for the catalytic oxidizers:

a. The design and/or manufacturer's specifications:
b. The operational procedures and preventative maintenance records.
c. Results of all testing of the catalytic element.
d. The temperature monitoring devices shall be recorded continuously.
e. The permittee shall record all periods (during actual operation) during which the temperature difference across the catalyst bed of the catalytic oxidizer (outlet temperature - inlet temperature) is zero or negative and corrective actions taken.
f. During all periods of startup, shutdown, or malfunction of the catalytic oxidizer, a daily log of the following shall be kept:
    1. Whether any air emissions were visible from the facilities associated with the catalytic oxidizer.
    2. Whether visible emissions were normal for the process.
    3. The cause of the visible emissions.
    4. Any corrective action taken.

2. Condenser/Filter control system:

The permittee shall maintain records of the following information for the condenser/filter control system:

a. The design and/or manufacturer's specifications:
b. The operational procedures and preventative maintenance records.
c. The temperature monitoring devices shall be recorded continuously.
d. The pressure drop monitoring devices shall be recorded once per shift.
e. The permittee shall record all periods (during actual operation) during which the temperature difference across the condenser/filter control system (outlet temperature - inlet temperature) is zero or positive and corrective actions taken.
f. The permittee shall record all periods (during actual operation) during which the pressure drops across the condenser/filter control system are zero or positive and corrective actions taken.
g. During all periods of startup, shutdown, or malfunction of the condenser/filter control system, a daily log of the following shall be kept:
    1. Whether any air emissions were visible from the facilities associated with the condenser/filter control system.
    2. Whether visible emissions were normal for the process.
    3. The cause of the visible emissions.
    4. Any corrective action taken.

6. Specific Reporting Requirements:

The permittee shall submit a semi-annual report to the division's Frankfort Field Office which contains a summary report of all recordkeeping required in Sections 5.1.c.,5.1.e, 5.2.e, and 5.2f of this emission point.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

7. Specific Control Equipment Operating Conditions:

1.The catalytic oxidizers and condenser/filter control system shall be operated in accordance with manufacturer's recommendations and standard operating practices.

2. The inlet temperature of the catalytic oxidizer shall be maintained at a minimum of 550 degrees F when the press is operating.

8. Alternate Operating Scenarios: None

9. Compliance Schedule*:* None

10. Compliance Certification Requirements: See Section F(7).

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

05 (05) Hantscho Mark VI 4 Unit Web Offset Heatset Lithographic Printing Press 409 with a 2.8 MMBTU/hr natural gas fired dryer controlled by a MMT condenser/filter system Model SCF5-4500 - control efficiency - 72%
Maximum continuous rating: Ink - 50 lbs/hr
Fountain solution - 0.6 lbs/hr
Blanket wash -0.288 gal/hr
Construction commenced: March 1996

APPLICABLE REGULATIONS: None

1. Operating Limitations:

Usage rates and VOC contents of all VOC containing materials shall be restricted so as to meet the emission limitations in Section B.2.

2. Emission Limitations:

VOC emissions shall not exceed equal or exceed 40 tons/yr based on a 12 month rolling total to preclude applicability of 401 KAR 51:017, Prevention of significant deterioration of air quality.

Compliance Demonstration Method:

1. The following formula may be used in calculating emissions of VOC's from ink:
   VOC emitted(tons/month) =
   [tons of ink used per month x %VOC content of ink x 0.8 x (1-removal efficiency of the condenser/filter control system)]
2. The following formula may be used in calculating emissions of VOC's from fountain solution:
   VOC emitted(tons/month) =
   [tons of fountain solution used per month x % VOC content of fountain solution x 0.7 x (1 - removal efficiency of the condenser/filter control system)] + [tons of fountain solution used per month x %VOC content of fountain solution x 0.3]
3. The following formula may be used in calculating emissions of VOC's from manual blanket wash cleanup:
   VOC emitted(tons/month) =
   [Gallons of blanket wash used per month x VOC content of blanket wash (lbs/gal) x (1ton/2000lbs) x 0.50]

3. Testing Requirements:

The permittee shall conduct required performance tests on the condenser/filter system to determine the overall removal efficiency of volatile organic compounds using Method 18 specified in Regulation 401 KAR 50:015, Documents incorporated by reference, or other method approved in the Compliance Test Protocol (see Section G(d)6). A continuous measure of the inlet and outlet temperatures of the condenser/filter control system and all pressure drops shall be made during the test. See 4.1 of this section. Testing shall take place within six months following the issuance of this permit and six months before the expiration date of this permit.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

4. Specific Monitoring Requirements:

Condenser/filter control system:

1. A monitoring device for the continuous measurement of the inlet and outlet temperature of the condenser/filter control system shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications. The monitoring device shall be certified by the manufacturer to be accurate to +/-1 percent of the temperature being monitored.The monitoring device shall be connected to a device(s) that records the temperature via a strip chart, electronic media, or other means. Any required recording system shall be installed and operational no later than 180 days from the date of issuance of this permit.
2. Monitoring devices for the continuous measurement of pressure drops across the condenser/filter control system shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications. The monitoring devices shall be certified by the manufacturer to be accurate to +/- 1 percent of the pressure drop being monitored.

5. Specific Recordkeeping Requirements:

1. The permittee shall keep monthly records of the usage rates of all materials used at the press along with a calculation of total emissions of VOC for the current month and per 12 months. The emissions per 12 month totals shall be based on a 12 month rolling total. These records, as well as purchase orders and invoices for all VOC containing materials shall be made available for inspection upon request by any duly authorized representatives of the Division for Air Quality.
2. The permittee shall maintain records of the following information for the condenser/filter control system:
   a. The design and/or manufacturer's specifications:
   b. The operational procedures and preventative maintenance records.
   c. The temperature monitoring devices shall be recorded continuously.
   d. The pressure drop monitoring devices shall be recorded once per shift.
   e. The permittee shall record all periods (during actual operation) during which the temperature difference across the condenser/filter control system (outlet temperature - inlet temperature) is zero or positive and corrective actions taken.
   f. The permittee shall also record all periods (during actual operation) during which the temperature difference across the condenser/filter control system (outlet temperature - inlet temperature) is less than 80% of the average temperature difference of the monitoring devices as measured during the most recent performance test.
   g. The permittee shall record all periods (during actual operation) during which the pressure drops across the condenser/filter control system are zero or positive and corrective actions taken.
   h. The permittee shall also record all periods (during actual operation) during which the pressure drops across the condenser/filter control system are less than 80% most recent performance test.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

i. During all periods of startup, shutdown, or malfunction of the condenser/filter control system, a daily log of the following shall be kept:
   1. Whether any air emissions were visible from the facilities associated with the condenser/filter control system.
   2. Whether visible emissions were normal for the process.
   3. The cause of the visible emissions.
   4. Any corrective action taken.

6. Specific Reporting Requirements:
The permittee shall submit a semi-annual report to the division's Frankfort Field Office which contains a summary report of all recordkeeping required in Sections 5.1, 5.2.e, 5.2.f, 5.2.g., and 5.2.h. of this emission point.

7. Specific Control Equipment Operating Conditions:
The condenser/filter control system shall be operated in accordance with manufacturer's recommendations and standard operating practices.

8. Alternate Operating Scenarios: None

9. Compliance Schedule: None

10. Compliance Certification Requirements: See Section F(7).

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

06 (06) Hantscho Mark XVI 8 Unit Web Offset Lithographic Printing Press 411 with a 6.48 MMBTU/hr natural gas fired dryer controlled by a TEC, CPRC 2 4000 - 1.3 MMBTU/hr natural gas fired catalytic oxidizer with propane backup - control efficiency - 98%
Maximum continuous rating: Ink - 35 lbs/hr
Fountain solution - 1.3 lbs/hr
Blanket wash - 0.563 gal/hr
Construction commenced: May 1997

APPLICABLE REGULATIONS: None

1. **Operating Limitations:**
Usage rates and VOC contents of all VOC containing materials shall be restricted so as to meet the emission limitations in Section B.2.

2. **Emission Limitations:**
VOC emissions shall not equal or exceed 20 tons/yr based on a 12 month rolling total to preclude applicability of 401 KAR 51:017, Prevention of significant deterioration of air quality.

Compliance Demonstration Method:

1. The following formula may be used in calculating emissions of VOC's from ink:
VOC emitted(tons/month) =
[Tons of ink used per month x %VOC content of ink x 0.8 x (1 - removal efficiency of the condenser/filter control system)
2. The following formula may be used in calculating emissions of VOC's from fountain solution:
VOC emitted(tons/month) =
[Tons of fountain solution used per month x %VOC content of fountain solution x 0.7 x (1 - removal efficiency of the condenser/filter control system)] + [tons of fountain solution used per month x %VOC content of fountain solution x 0.3]
3. The following formula may be used in calculating emissions of VOC's from manual blanket wash cleanup:
VOC emitted(tons/month) =
[Gallons of blanket wash used per month x VOC content of blanket wash (lbs/gal) x (1ton/2000lbs) x 0.50]

3. **Testing Requirements:**
The permittee shall conduct a required performance test on the catalytic oxidizer to determine the overall removal efficiency of volatile organic compounds using Method 25A specified in Regulation 401 KAR 50:015, Documents incorporated by reference, or other method approved in the Compliance Test Protocol (see Section G(d)6). A continuous measure of the inlet and outlet temperatures of the catalyst bed of the catalytic oxidizer shall be made during the test. See 4.1 of this section. Testing shall take place six months before the expiration date of this permit.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

4. Specific Monitoring Requirements:

Catalytic oxidizer control:

1. A monitoring device for the continuous measurement of the gas stream temperature immediately before and after the catalyst bed in the catalytic oxidizer shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications. The monitoring devices shall be certified by the manufacturer to be accurate to +/- 1 percent of the temperature being monitored. monitored. The monitoring device shall be connected to a device(s) that records the temperature via a strip chart, electronic media, or other means. Any required recording system shall be installed and operational no later than 180 days from the date of issuance of this permit.
2. Yearly testing of the catalytic element shall be done by a qualified testing lab.

5. Specific Recordkeeping Requirements:

1. The permittee shall keep monthly records of the usage rates of all materials used at each press along with a calculation of total emissions of VOC for the current month and per 12 months. The emissions per 12 month totals shall be based on a 12 month rolling total. These records, as well as purchase orders and invoices for all VOC containing materials shall be made available for inspection upon request by any duly authorized representatives of the Division for Air Quality.
2. Catalytic oxidizer control:
   The permittee shall maintain records of the following information for the catalytic oxidizer:
   a. The design and/or manufacturer's specifications:
   b. The operational procedures and preventative maintenance records.
   c. Results of all testing of the catalytic element.
   d. The temperature monitoring devices shall be recorded continously.
   e. The permittee shall record all periods (during actual operation) during which the temperature difference across the catalyst bed of the catalytic oxidizer (outlet temperature - inlet temperature) is zero or negative and corrective actions taken.
   f. The permittee shall also record all periods (during actual operation) during which the temperature difference across the catalyst bed of the catalytic oxidizer (outlet temperature - inlet temperature) is less than 80% of the average temperature difference of the monitoring devices as measured during the most recent performance test.
   g. During all periods of startup, shutdown, or malfunction of the catalytic oxidizer, a daily log of the following shall be kept:
      1. Whether any air emissions were visible from the facilities associated with the catalytic oxidizer.
      2. Whether visible emissions were normal for the process.
      3. The cause of the visible emissions.
      4. Any corrective action taken.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

6. Specific Reporting Requirements:

The permittee shall submit a semi-annual report to the division's Frankfort Field Office which contains a summary report of all recordkeeping required in Sections 5.1, 5.2.c., 5.2.e, and 5.2.f. of this emission point.

7. Specific Control Equipment Operating Conditions:

1.The catalytic oxidizer control system shall be operated in accordance with manufacturer's recommendations and standard operating practices.

2. The operating temperature of the catalytic oxidizer shall be maintained at a minimum of 550 degrees F when the press is operating.

8. Alternate Operating Scenarios: None

9. Compliance Schedule: None

10. Compliance Certification Requirements: See Section F(7).

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

08 (08) Hantscho 8 Unit Web Offset Lithographic Printing Press 410 with a 4.0 MMBTU/hr natural gas fired dryer controlled by a Magnum 8000 Meg TEC Systems 4.0 MMBTU/hr natural gas fired catalytic oxidizer with propane backup - control efficiency - 95%
Maximum rated capacity: Ink - 50 lbs/hr
Fountain solution - 1.3 lbs/hr
Blanket wash - 0.5 gal/hr
Date commenced: 1999

(08) Hantscho 6 Unit Web Offset Lithographic Printing Press 412 with a 1.3 MMBTU/hr natural gas fired dryer controlled by a Magnum 8000 Meg TEC Systems 4.0 MMBTU/hr natural gas fired catalytic oxidizer with propane backup - control efficiency - 95%
Maximum rated capacity: Ink - 50 lbs/hr
Fountain solution - 0.6 lbs/hr
Blanket wash - 0.24 gal/hr
Date commenced: To be constructed

APPLICABLE REGULATIONS: None

1. **Operating Limitations:**
Usage rates and VOC contents of all VOC containing materials shall be restricted so as to meet the emission limitations in Section B.2.

2. **Emission Limitations:**
VOC emissions shall not equal or exceed 20 tons/yr based on a 12 month rolling total of both presses to preclude applicability of 401 KAR 51:017, Prevention of significant deterioration of air quality.

Compliance Demonstration Method:

1. The following formula may be used in calculating emissions of VOC's from ink:
VOC emitted(tons/month) =
[Tons of ink used per month x %VOC content of ink x 0.8 x (1 - removal efficiency of the condenser/filter control system)]
2. The following formula may be used in calculating emissions of VOC's from fountain solution:
VOC emitted(tons/month) =
[tons of fountain solution used per month x %VOC content of fountain solution x 0.7 x (1 - removal efficiency of the condenser/filter control system)] + [tons of fountain solution used per month x %VOC content of fountain solution x 0.3]
3. The following formula may be used in calculating emissions of VOC's from manual blanket wash cleanup:
VOC emitted(tons/month) =
[Gallons of blanket wash used per month x VOC content of blanket wash (lbs/gal) x (1ton/2000lbs) x 0.50]

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

3. Testing Requirements:

The permittee shall conduct required performance tests on the catalytic oxidizer to determine the overall removal efficiency of volatile organic compounds using Method 25A specified in Regulation 401 KAR 50:015, Documents incorporated by reference, or other method approved in the Compliance Test Protocol (see Section G(d)6). A continuous measure of the inlet and outlet temperatures of the catalyst bed of the catalytic oxidizer shall be made during the tests. See 4.1 of this section. Testing shall take place as required by Section G(d) and six months before the expiration date of this permit.

4. Specific Monitoring Requirements:

Catalytic oxidizer control:

1. A monitoring device for the continuous measurement of the gas stream temperature immediately before and after the catalyst bed in the catalytic oxidizer shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications. The monitoring devices shall be certified by the manufacturer to be accurate to +/- 1 percent of the temperature being monitored. The monitoring device shall be connected to a device(s) that records the temperature via a strip chart, electronic media, or other means. Any required recording system shall be installed and operational no later than 180 days from the date of issuance of this permit.
2. Yearly testing of the catalytic element shall be done by a qualified testing lab.

5. Specific Recordkeeping Requirements:

1. The permittee shall keep monthly records of the usage rates of all materials used at the press along with a calculation of total emissions of VOC for both presses for the current month and per 12 months. The emissions per 12 month totals shall be based on a 12 month rolling total. These records, as well as purchase orders and invoices for all VOC containing materials shall be made available for inspection upon request by any duly authorized representatives of the Division for Air Quality.
2. Catalytic oxidizer control:
   The permittee shall maintain records of the following information for the catalytic oxidizer:
   a. The design and/or manufacturer's specifications:
   b. The operational procedures and preventative maintenance records.
   c. Results of all testing of the catalytic element.
   d. The temperature monitoring devices shall be recorded continously.
   e. The permittee shall record all periods (during actual operation) during which the temperature difference across the catalyst bed of the catalytic oxidizer (outlet temperature - inlet temperature) is zero or negative and corrective actions taken.
   f. The permittee shall also record all periods (during actual operation) during which the temperature difference across the catalyst bed of the catalytic oxidizer (outlet temperature - inlet temperature) is less than 80% of the of the average temperature difference of the montoring devices as measured during the most recent performance test.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

g. During all periods of startup, shutdown, or malfunction of the catalytic oxidizer, a daily log of the following shall be kept:
   1. Whether any air emissions were visible from the facilities associated with the catalytic oxidizer.
   2. Whether visible emissions were normal for the process.
   3. The cause of the visible emissions.
   4. Any corrective action taken.

6. Specific Reporting Requirements:

The permittee shall submit a semi-annual report to the division's Frankfort Field Office which contains a summary report of all recordkeeping required in Sections 5.1, 5.2.c., 5.2.e, and 5.2.f. of this emission point.

7. Specific Control Equipment Operating Conditions:

1. The catalytic oxidizer control system shall be operated in accordance with manufacturer's recommendations and standard operating practices.
2. The operating temperature of the catalytic oxidizer shall be maintained at a minimum of 550 degrees F when the press is operating.

8. Alternate Operating Scenarios:

9. Compliance Schedule: None

10. Compliance Certification Requirements: See Section F(7).

SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to Regulation 401 KAR 50:035, Section 5(4). While these activities are designated as insignificant the permittee must comply with the applicable regulation and some minimal level of periodic monitoring may be necessary.

	Description	Generally Applicable Regulation
1.	30,000 gallon propane tank	None
2.	Surface preparation for maintenance painting	None
3.	Maintenance paint spray booth	401 KAR 59:010
4.	Five hot melt magazine binding gluers	None
5.	Twelve natural gas/propane space heaters	None
6.	Ink jet printing	None
7.	Five ink jet head cleaning stations	None
8.	Four chillers with associated cooling towers	None 401 KAR 63:010
9.	Scrap paper collection system	401 KAR 59:010
10.	Boiler X1 - 4.0 MMBtu/hr Natural gas fired with propane backup	401 KAR 59:015
11.	Boiler X2 - 4.0 MMBtu/hr Natural gas fired with propane backup	401 KAR 59:015
12.	Cold solvent cleaner	None

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

1. PM/PM10, VOC, and SO2 emissions, as measured by methods referenced in 401 KAR 50:015, Section 1, shall not exceed the respective limitations specified herein.

2. Compliance with annual emissions and processing limitations imposed pursuant to 401 KAR 50:035, Section 7(1)(a), and contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

1. Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS

1. When continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
   a. Date, place as defined in this permit, and time of sampling or measurements.
   b. Analyses performance dates;
   c. Company or entity that performed analyses;
   d. Analytical techniques or methods used;
   e. Analyses results; and
   f. Operating conditions during time of sampling or measurement;

2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality. [401 KAR 50:035, Permits, Section 7(1)(d)2 and 401 KAR 50:035, Permits, Section 7(2)(c)]

3. In accordance with the requirements of Regulation 401 KAR 50:035, Permits, Section 7(2)(c) the permittee shall allow the Cabinet or authorized representatives to perform the following:
   a. Enter upon the premises where a source is located or emissions-related activity is conducted, or where records are kept;
   b. Have access to and copy, at reasonable times, any records required by the permit:
      i. During normal office hours, and
      ii. During periods of emergency when prompt access to records is essential to proper assessment by the Cabinet;
   c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit. Reasonable times shall include, but are not limited to the following:
      i. During all hours of operation at the source,
      ii. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and
      iii. During an emergency; and
   d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements. Reasonable times shall include, but are not limited to the following:
      i. During all hours of operation at the source,
      ii. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and
      iii. During an emergency.

4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

5. Reports of monitoring required by this permit as stated in Section B.6. of each emission point, other than continuous emission or opacity monitors, shall be reported to the division's Bluegrass Regional Office no later than the six-month anniversary date of this permit and every six months thereafter during the life of this permit, unless otherwise stated in this permit. The permittee may shift to semi-annual reporting on a calendar year basis upon approval of the regional office. If calendar year reporting is approved, the semi-annual reports are due January 30th and July 30th of each year. Data from the continuous emission and opacity monitors shall be reported to the Technical Services Branch in accordance with the requirements of Regulation 401 KAR 59:005, General Provisions, Section 3(3). All reports shall be certified by a responsible official pursuant to Section 6(1) of Regulation 401 KAR 50:035, Permits. All deviations from permit requirements shall be clearly identified in the reports.

6. a. In accordance with the provisions of Regulation 401 KAR 50:055, Section 1 the owner or operator shall notify the Division for Air Quality's Frankfort Regional Office concerning startups, shutdowns, or malfunctions as follows:
    1. When emissions during any planned shutdowns and ensuing startups will exceed the standards notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
    2. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards notification shall be made as promptly as possible by telephone (or other electronic media) and shall cause written notice upon request.

   b. In accordance with the provisions of Regulation 401 KAR 50:035, Section 7(1)(e)2, the owner or operator shall report emission related exceedances from permit requirements including those attributed to upset conditions (other than emission exceedances covered by general condition 6 a. above) to the Division for Air Quality's Bluegrass Regional Office within 3 days. Other deviations from permit requirements shall be included in the semiannual report required by general condition F.5.

7. Pursuant to Regulation 401 KAR 50:035, Permits, Section 7(2)(b), the permittee shall certify compliance with the terms and conditions contained in this permit, annually on the permit issuance anniversary date or by January 30th of each year if calendar year reporting is approved by the regional office, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Division for Air Quality's Frankfort Regional Office and the U.S. EPA in accordance with the following requirements:
   a. Identification of each term or condition of the permit that is the basis of the certification;
   b. The compliance status regarding each term or condition of the permit;
   c. Whether compliance was continuous or intermittent; and
   d. The method used for determining the compliance status for the source, currently and over the reporting period, pursuant to 401 KAR 50:035, Section 7(1)(c),(d), and (e).

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

e. The certification shall be postmarked by the thirtieth (30) day following the applicable permit issuance anniversary date, or by January 30th of each year if calendar year reporting is approved by the regional office. **Annual compliance certifications should be mailed to the following addresses:**

Division for Air Quality
Frankfort Regional Office
643 Teton Trail, Suite B
Frankfort, KY 40601

U.S. EPA Region IV
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth St.
Atlanta, GA 30303-8960

Division for Air Quality
Central Files
803 Schenkel Lane
Frankfort, KY 40601

8. In accordance with Regulation 401 KAR 50:035, Section 23, the permittee shall provide the division with all information necessary to determine its subject emissions within thirty (30) days of the date the KEIS emission report is mailed to the permittee.

9. Pursuant to Section VII.3 of the policy manual of the Division for Air Quality as referenced by Regulation 401 KAR 50:016, Section 1(1), results of performance test(s) required by the permit shall be submitted to the division by the source or its representative within forty-five days after the completion of the fieldwork.

SECTION G - GENERAL CONDITIONS

(a) General Compliance Requirements

1. The permittee shall comply with all conditions of this permit. A noncompliance shall be (a) violation(s) of state regulation 401 KAR 50:035, Permits, Section 7(3)(d) and for federally enforceable permits is also a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.

2. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition.

3. This permit may be revised, revoked, reopened and reissued, or terminated for cause. The permit will be reopened for cause and revised accordingly under the following circumstances:
   a. If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to Regulation 401 KAR 50:035, Section 12(2)(c);
   b. The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
   c. The Cabinet or the U. S. EPA for federal permits determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit;

   Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the division may provide a shorter time period in the case of an emergency.

4. The permittee shall furnish to the division, in writing, information that the division may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. [401 KAR 50:035, Permits, Section 7(2)(b)3e and 401 KAR 50:035, Permits, Section 7(3)(j)]

5. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority.

SECTION G - GENERAL CONDITIONS (CONTINUED)

6. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit. [401 KAR 50:035, Permits, Section 7(3)(k)]

7. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance. [401 KAR 50:035, Permits, Section 7(3)(e)]

8. Except as identified as state-origin requirements in this permit, all terms and conditions contained herein shall be enforceable by the United States Environmental Protection Agency and citizens of the United States.

9. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6). [401 KAR 50:035, Permits, Section 7(3)(h)]

10. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance. [401 KAR 50:035, Permits, Section 8(3)(b)]

11. This permit shall not convey property rights or exclusive privileges. [401 KAR 50:035, Permits, Section 7 (3)(g)]

12. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Natural Resources and Environmental Protection or any other federal, state, or local agency.

13. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry. [401 KAR 50:035, Permits, Section 7(2)(b)5]

14. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders. [401 KAR 50:035, Permits, Section 8(3)(a)]

15. Permit Shield: Except as provided in State Regulation 401 KAR 50:035, Permits, compliance by the affected facilities listed herein with the conditions of this permit shall be deemed to be compliance with all applicable requirements identified in this permit as of the date of issuance of this permit.

16. All previously issued construction and operating permits are hereby null and void.

SECTION G - GENERAL CONDITIONS (CONTINUED)

(b) Permit Expiration and Reapplication Requirements

This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the division. [401 KAR 50:035, Permits, Section 12]

(c) Permit Revisions

1. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of Regulation 401 KAR 50:035, Section 15.

2. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority thirty (30) days in advance of the transfer.

(d) Construction, Start-Up, and Initial Compliance Demonstration Requirements
(This applies to EP08 (Presses 410 and 412)

1. Construction of process and/or air pollution control equipment authorized by this permit shall be conducted and completed only in compliance with the conditions of this permit.

2. Within thirty (30) days following commencement of construction, and within fifteen (15) days following start-up, and attainment of the maximum production rate specified in the permit application, or within fifteen (15) days following the issuance date of this permit, whichever is later, the permittee shall furnish to the Division for Air Quality's Frankfort Regional Office in writing, with a copy to the division's Frankfort Central Office, notification of the following:
   a. The date when construction commenced.
   b. The date of start-up of the affected facilities listed in this permit.
   c. The date when the maximum production rate specified in the permit application was achieved.

SECTION G - GENERAL CONDITIONS (CONTINUED)

3. Pursuant to State Regulation 401 KAR 50:035, Permits, Section 13(1), unless construction is commenced on or before 18 months after the date of issue of this permit, or if construction is commenced and then stopped for any consecutive period of 18 months or more, or if construction is not completed within eighteen (18) months of the scheduled completion date, then the construction and operating authority granted by this permit for those affected facilities for which construction was not completed shall immediately become invalid. Extensions of the time periods specified herein may be granted by the division upon a satisfactory request showing that an extension is justified.

4. Operation of the affected facilities for which construction is authorized by this permit shall not commence until compliance with the applicable standards specified herein has been demonstrated pursuant to 401 KAR 50:055, except as provided in Section I of this permit.

5. This permit shall allow time for the initial start-up, operation, and compliance demonstration of the affected facilities listed herein. However, within sixty (60) days after achieving the maximum production rate at which the affected facilities will be operated but not later than 180 days after initial start-up of such facilities, the permittee shall conduct a performance test on the affected facilities in accordance with Regulation 401 KAR 50:055, General compliance requirements. These performance tests must also be conducted in accordance with General Conditions G(d)6 of this permit and the permittee must furnish to the Division for Air Quality's Frankfort Central Office a written report of the results of such performance test.

6. Pursuant to Section VII 2.(1) of the policy manual of the Division for Air Quality as referenced by Regulation 401 KAR 50:016, Section 1.(1), at least one month prior to the date of the required performance test, the permittee shall complete and return a Compliance Test Protocol (Form DEP 6027) to the division's Frankfort Central Office. Pursuant to 401 KAR 50:045, Section 5, the division shall be notified of the actual test date at least ten (10) days prior to the test.

(e) Acid Rain Program Requirements

1. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

(f) Emergency Provisions

1. An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or other relevant evidence that:
   a. An emergency occurred and the permittee can identify the cause of the emergency;
   b. The permitted facility was at the time being properly operated;
   c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and,

SECTION G - GENERAL CONDITIONS (CONTINUED)

1. d. The permittee notified the division as promptly as possible and submitted written notice of the emergency to the division within two working days after the time when emission limitations were exceeded due to the emergency. The notice shall meet the requirements of 401 KAR 50:035, Permits, Section 7(1)(e)2, and include a description of the emergency, steps taken to mitigate emissions, and the corrective actions taken. This requirement does not relieve the source of any other local, state or federal notification requirements.

2. Emergency conditions listed in General Condition (f)1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement.

3. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [401 KAR 50:035, Permits, Section 9(3)]

(g) Risk Management Provisions

1. The permittee shall comply with all applicable requirements of 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to:
   RMP Reporting Center
   P.O. Box 3346
   Merrifield, VA, 22116-3346

2. If requested, submit additional relevant information by the division or the U.S. EPA.

(h) Ozone depleting substances

1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
   a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
   b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
   c. Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
   d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166.
   e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
   f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

SECTION G - GENERAL CONDITIONS (CONTINUED)

2. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

SECTION H - ALTERNATE OPERATING SCENARIOS

None

SECTION I - COMPLIANCE SCHEDULE

None